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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 IN RE FACEBOOK BIOMETRIC  
13 INFORMATION PRIVACY LITIGATION

14  
15 THIS DOCUMENT RELATES TO:  
16 ALL ACTIONS

**DECLARATION OF MARK  
ZUCKERBERG IN SUPPORT OF THE  
MOTION OF FACEBOOK, INC. AND  
MARK ZUCKERBERG TO QUASH  
PLAINTIFFS' SUBPOENA TO APPEAR  
AND TESTIFY AT A HEARING OR  
TRIAL**

Master Docket No.: 3:15-CV-03747-JD

Hon. James Donato

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19 I, Mark Zuckerberg, hereby declare as follows:


20 1. I am the Chairman and Chief Executive Officer of Facebook, Inc. ("Facebook").

21 2. I make this declaration on my own personal knowledge and, if called upon as a  
22 witness to do so, I could and would competently testify as to the matters set forth herein.

23 3. I have been informed by counsel that the above-captioned matter is a lawsuit  
24 brought by Illinois residents under the Illinois Biometric Information Privacy Act, alleging that  
25 Facebook used facial-recognition technology to analyze their photos, and to create and store  
26 "templates" for them, without giving them adequate notice or obtaining their consent.  
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DECLARATION OF MARK ZUCKERBERG  
MASTER CASE NO. 3:15-CV-03747-JD

I declare under penalty of perjury under the laws of the State of                      and the United States that the foregoing is true and correct.

  
Mark Zuckerberg